

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	

	X	
	:	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-4780 (LTS)
	:	
PUERTO RICO ELECTRIC POWER AUTHORITY, <i>et al.</i> ,	:	
	:	
Debtors.	:	

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as a representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Plaintiff and Counterclaim Defendant,

-and-

PUERTO RICO FISCAL AGENCY AND FINANCIAL
ADVISORY AUTHORITY, THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS OF ALL
TITLE III DEBTORS, CORTLAND CAPITAL MARKET
SERVICES, SOLA LTD., SOLUS OPPORTUNITIES
FUND 5 LP, ULTRA MASTER LTD. ULTRA NB LLC,
UNION DE TRABAJADORES DE LA INDUSTRIA
ELECTRICA Y RIEGO INC., AND SISTEMA DE
RETIRO DE LOS EMPLEADOS DE LA AUTORIDAD
DE ENERGIA ELECTRICA,

Intervenor-Plaintiffs,

v.

U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE,

Defendant and Counterclaim Plaintiff

-and-

THE AD HOC GROUP OF PREPA BONDHOLDERS,
ASSURED GUARANTY CORP., ASSURED
GUARANTY MUNICIPAL CORP., NATIONAL
PUBLIC FINANCE GUARANTEE CORPORATION,
AND SYNCORA GUARANTEE, INC.

Intervenor Defendants and Counterclaim
Plaintiffs.

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Adv. Proc. No. 19-00391 (LTS)

**INFORMATIVE MOTION OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS REGARDING FEBRUARY 1-2, 2023, OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all Title III Debtors (the “Committee”)¹ hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for Hearing on February 1-2, 2023, Omnibus Hearing* [Case No. 17-3283, Docket No. 23253] (the “Scheduling Order”) and respectfully states as follows:

1. Luc A. Despins and Pedro A. Jimenez of Paul Hastings LLP will appear in-person on behalf of the Committee at the Hearing (as defined in the Scheduling Order), at the San Juan Courthouse, and G. Alexander Bongartz of Paul Hastings LLP will appear in-person on behalf of the Committee at the Hearing, at the New York Courthouse, and address, as necessary, the following matters:

- (a) Status Report to be filed by the Oversight Board;
- (b) Status Report to be filed by AAFAF;
- (c) *Debtors’ Notice of Motion for an Order Further Extending the Deadline to File Objections to Proofs of Claim* [Docket No. 23234];
 - (i) *Response of Official Committee of Unsecured Creditors to Debtors’ Motion for Order Further Extending Deadline to File Objection to Proofs of Claim* [Docket No. 23263];
- (d) *Notice of Motion and Motion of the Financial Oversight and Management Board of Puerto Rico, as Title III Representative of the Puerto Rico Electric Power Authority, For Summary Judgment Pursuant To Bankruptcy Rule 7056* [Adv. Proc. No. 19-391, Docket No. 62];

¹ The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

- (i) *Memorandum of the Financial Oversight and Management Board of Puerto Rico, as Title III Representative of the Puerto Rico Electric Power Authority, in Support of Motion Pursuant to Bankruptcy Rule 7056 for Summary Judgment* [Adv. Proc. No. 19-391, Docket No. 63];
- (ii) *Supplemental Brief and Joinder of Intervenor-Plaintiff Official Committee of Unsecured Creditors in Support of Oversight Board's Motion for Summary Judgment* [Adv. Proc. No. 19-391, Docket No. 76];
- (iii) *Supplemental Brief and Joinder of Intervenor-Plaintiff Official Committee of Unsecured Creditors' in Support of Reply of Financial Oversight and Management Board of Puerto Rico, as Title III Representative of Puerto Rico Electric Power Authority, in Support of Summary Judgment Motion [ECF NO. 63]* [Adv. Proc. No. 19-391, Docket No. 111];
- (e) *Motion for Summary Judgment and Memorandum in Support of Defendant/Counterclaim-Plaintiffs and Intervenor-Defendants/Counterclaim-Plaintiffs Motion for Summary Judgment Against Plaintiffs/Counterclaim-Defendants* [Adv. Proc. No. 19-391, Docket No. 67];
- (i) *Supplemental Brief and Joinder of Intervenor-Plaintiff Official Committee of Unsecured Creditors' in Support of Response of Financial Oversight and Management Board of Puerto Rico, as Title III Representative of the Puerto Rico Electric Power Authority, to Summary Judgment Motion of Defendant-Counterclaim Plaintiff* [Adv. Proc. Docket No. 67] [Adv. Proc. No. 19-391, Docket No. 94];

- (f) Any other matter in connection with the *Order Regarding Oral Argument On Motions For Summary Judgment* [Adv. Proc. 19-00391, Docket No. 119];
- (g) Any objections, responses, statements, joinders, or replies to any of the foregoing;
and;
- (h) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.

2. In addition, Shlomo Maza of Paul Hastings LLP will observe the Hearing, in person, in the San Juan Courthouse.

3. Finally, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the Hearing, in person, in the San Juan Courthouse.

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WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: January 25, 2023

/s/ Luc A. Despins

PAUL HASTINGS LLP
Luc. A. Despins, Esq. (Pro Hac Vice)
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Counsel to the Official Committee of Unsecured Creditors

- and -

/s/ Juan J. Casillas Ayala

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Local Counsel to the Official Committee of Unsecured Creditors

Exhibit A

PARTY APPEARANCE SHEET

Name of Party		Official Committee of Unsecured Creditors
ATTORNEY 1	Appearance Method	In Person San Juan
	Name	Luc A. Despins
	Law Firm	Paul Hastings LLP
	Email	lucdespins@paulhastings.com
	Phone Number	(212) 318-6001
	Docket Entry No. of Notice of Appearance	Docket No. 494
ATTORNEY 2	Appearance Method	In Person San Juan
	Name	Pedro A. Jimenez
	Law Firm	Paul Hastings LLP
	Email	pedrojimenez@paulhastings.com
	Phone Number	(212) 318-6790
	Docket Entry No. of Notice of Appearance	Docket No. 23318
ATTORNEY 3	Appearance Method	In Person NY
	Name	G. Alexander Bongartz
	Law Firm	Paul Hastings LLP
	Email	alexbongartz@paulhastings.com
	Phone Number	(212) 318-6472
	Docket Entry No. of Notice of Appearance	Docket No. 494
ATTORNEY 4	Appearance Method	In Person San Juan
	Name	Shlomo Maza
	Law Firm	Paul Hastings LLP
	Email	shlomomaza@paulhastings.com
	Phone Number	(212) 318-6778
	Docket Entry No. of Notice of Appearance	Docket No. 13087